

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREW R. PERRONG  
1657 THE FAIRWAY #131  
JENKINTOWN, PA 19046

Plaintiff

v.

ATOM PROPERTY SOLUTIONS, LLC  
AND ANTON TAMKOVITCH  
Defendants.

Case No. 2:22-cv-02000-MMB

JURY TRIAL DEMANDED

**REQUEST FOR CLERK’S ENTRY OF DEFAULT AGAINST DEFENDANTS  
ATOM PROPERTY SOLUTIONS, LLC AND ANTON TAMKOVITCH**

COMES NOW Plaintiff Andrew R. Perrong, pursuant to Fed. R. Civ. P. 55(a), and hereby files this Motion for Clerk’s Entry of Default against both Defendants, Atom Property Solutions, LLC and Anton Tamkovitch, in the above-styled action. Mr. Perrong respectfully requests that the Clerk of Court enter default as the Defendants have failed to serve or file an answer to Plaintiff’s claims in this action within the time permitted by law or otherwise.

Federal Rule of Civil Procedure 12(a), entitled “Time to Serve a Responsive Pleading,” provides in pertinent part that “[a] defendant must serve an answer within 21 days after being served with the summons and complaint.” FED. R. CIV. P. 1(a)(1)(A)(i). Federal Rule of Civil Procedure 55(a), entitled “Entering a Default,” provides that “[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk *must* enter the party’s default.” FED. R. CIV. P. 1(a)(1)(A)(i) (emphasis added).

Here, the Plaintiff filed his Complaint on May 18, 2022. (See ECF No. 1.) Both Defendants were served with the Summons and Complaint on July 12, 2022. (See ECF No. 4.) Defendants did not file a response as of August 2, 2022. Accordingly, the Plaintiff requests that the Clerk enter the Defendants' default pursuant to FED. R. CIV. P. 55(a).

**CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the Clerk of Court enter default against the defendants pursuant to FED. R. CIV. P. 55(a).

Dated: **August 3, 2022**

\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2022 I filed the foregoing with the Clerk of the Court electronically via the email address PAED\_documents@paed.uscourts.gov.

\_\_\_\_\_/s/\_\_\_\_\_  
Andrew R. Perrong